

RECEIVED

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JAN 6 1999
FCC MAIL ROOM

In the Matter of)
)
Assessment and Collection of) MD Docket 98-200
Regulatory Fees for Fiscal Year 1999)
)

Industrial Telecommunications Association, Inc.'s
Request for Extension of Time to File Comments

1. The Industrial Telecommunications Association, Inc., (ITA) pursuant to Sections 1.46 and 1.415(e) of the rules,¹ hereby requests an extension of time to file comments in response to the above captioned *Notice of Inquiry* adopted by the Commission on November 10, 1998.²

2. ITA is a Commission-certified frequency advisory committee and coordinates in excess of 6,000 applications per year on behalf of applicants seeking Commission authority to operate business and industrial/land transportation radio stations on frequency assignments allocated between 30-900 MHz.

3. ITA enjoys the support of a membership that includes more than 5,000 licensed two-way land mobile radio communications users, private mobile radio service (PMRS) oriented radio dealer organizations, and the following trade associations:

Alliance of Motion Picture and Television Producers
Aeronautical Radio, Inc.
Associated Builders & Contractors, Inc.

No. of Copies rec'd _____
List A B C D E

¹ 47 C.F.R. §§ 1.46 and 1.415(e).

² See Assessment and Collection of Regulatory Fees for Fiscal Year 1999, *Notice of Inquiry*, FCC 98-298, (rel. Dec. 4, 1998).

Florida Citrus Processors Association
Florida Fruit & Vegetable Association
National Mining Congress
National Propane Gas Association
National Ready-Mixed Concrete Association
National Utility Contractors Association
New England Fuel Institute
United States Telephone Association

In addition, ITA is affiliated with the following independent market councils: the Council of Independent Communications Suppliers (CICS), the Taxicab & Livery Communications Council (TLCC), the Telephone Maintenance Frequency Advisory Committee (TELFAC), and USMSS, Inc. Because the issues raised in the *Notice of Inquiry* address the potential modification of the rules governing regulatory fees, ITA feels compelled to comment on this proceeding.

4. In the *Notice of Inquiry*, the Commission sought comment on clarification of the commercial mobile radio services (CMRS) fee categories.³ As part of the process, the Commission requested that commenters provide a revised methodology for assessing regulatory fees to CMRS providers which includes data that would “enable the Commission to definitively assign each type of service to the appropriate proposed fee category and provide an estimate of the number of feeable units contained in each category . . .”⁴ Because the issues raised address fundamental questions about how the regulatory fees for a significant segment of ITA’s membership will be assessed for fiscal year 1999, ITA decided to poll its membership regarding these issues before it files comment on the

³ *Id.* at ¶ 4.

⁴ *Id.* at ¶ 9.

Notice of Inquiry.

5. However, due to the holidays many of ITA's members were unavailable and the polling of the membership was not completed. Nevertheless, ITA requests that the comment period for the *Notice of Inquiry* be extended by thirty days in order to allow ITA to complete its polling efforts and to comment in a meaningful way regarding these important issues.

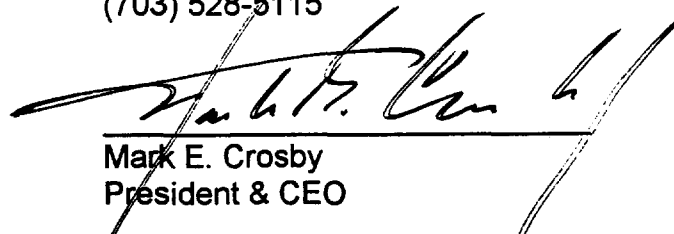
Respectfully Submitted,

Industrial Telecommunications Association, Inc.


1110 N. Glebe Road, Suite 500

Arlington, VA 22201

(703) 528-5115

A large, stylized handwritten signature in black ink, likely belonging to Mark E. Crosby, is written over a horizontal line.

Mark E. Crosby
President & CEO

A smaller, more cursive handwritten signature in black ink, likely belonging to Laura L. Smith, is written over a horizontal line.

Laura L. Smith, Esq.
Executive Director, Government Relations

CERTIFICATE OF SERVICE

I, Barbara J. Levermann, do hereby certify that on the 5th day of January 1999, I forwarded to the parties listed below a copy of the foregoing Request for Extension of Time to File Comments of the Industrial Telecommunications Association, Inc., by first-class mail, postage pre-paid:

Ari Fitzgerald, Esq.
Legal Advisor
Office of Chairman William E. Kennard
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, DC 20554

Daniel Connors, Esq.
Legal Advisor
Office of Commissioner Ness
Federal Communications Commission
1919 M Street, N.W., Room 832
Washington, DC 20554

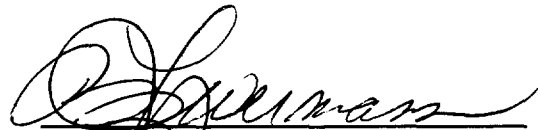
Paul E. Misener, Esq.
Senior Legal Advisor
Office of Commissioner Furchtgott-Roth
Federal Communications Commission
1919 M Street, N.W., Room 802
Washington, DC 20554

Peter A. Tenhula, Esq.
Legal Advisor
Office of Commissioner Powell
Federal Communications Commission
1919 M Street, N.W., Room 844
Washington, DC 20554

Karen L. Gulick, Esq.
Legal Advisor
Office of Commissioner Tristani
Federal Communications Commission
1919 M Street, N.W., Room 826
Washington, DC 20554

Andrew S. Fishel
Managing Director
Federal Communications Commission
1919 M Street, N.W., Room 852
Washington, DC 20554

Magalie Roman Salas
The Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, DC 20554


Barbara J. Levermann
Executive Assistant